



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 3, 2005

Reply To
Attn Of:

ETPA-088

Ref: 03-040-AFS

Jerry R. Reese, Forest Supervisor
Caribou-Targhee National Forest
1405 Hollipark Drive
Idaho Falls, ID 83401

Dear Mr. Reese:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Aspen Range Timber Sale** (CEQ No. 20050158) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The draft EIS documents the analysis for the proposed Aspen Range Timber Sale in the Caribou-Targhee National Forest. Proposed actions include mechanical timber harvest, prescribed fire and transportation improvements within a 12,000 acre project area. The proposed actions would change tree species composition, density and structure in an effort to release aspen from competing conifers and convert back to early seral species. In addition, the proposed project would reduce the undesirable wildfire effects, capture the economic value of timber and improve transportation systems.

The EIS evaluates three action alternatives that include timber harvest, tree stand thinning, prescribed burns and road realignment, construction and closure. The EIS identifies Alternative 4 (Reduced Roads) as the preferred alternative. We have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the draft EIS based on the action alternatives. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Our concerns with the EIS focus on lack of a stated purpose for the project, the project's ability to meet desired future age class conditions, impacts from timber harvest activities, roads, and big game coverage.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these comments in detail, please contact Mike Letourneau at (206) 553-6382 or myself at (206) 553-1601.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

Enclosure

cc: J. Werntz, EPA-IOO
L. Woodruff, EPA-IOO

Aspen Range Timber Sale and Vegetation Treatment Draft Environmental Impact Statement

Project Purpose

Chapter 1 of the EIS is entitled **Purpose of and Need for Action**, however, the purpose of the project is never stated. The EIS needs to include a clear and concise statement of the underlying purpose for the proposed project, consistent with the implementing regulations for NEPA (see 40 CFR 1502.3). In presenting the purpose for the project, the EIS should reflect not only the Forest Service's purpose, but also the broader public interest. Given the numerous objectives listed in the EIS, a concise purpose statement is critical to evaluating the alternatives.

Desired Future Condition

The EIS includes Desired Future Condition (DFC) criteria as purpose and need indicators. Of the three DFC criteria only one of the criteria (seedling/sapling) is met by any of the alternatives (Alternative 2 and Alternative 4). In addition, the EIS states that all the action alternatives would continue to have surplus acres of mature/old structural stands and additional silvicultural restoration would be needed to provide new seedling/sapling structure. While the EIS does not provide a purpose statement, it is clear from the stated need and objectives that converting plant communities to early seral stages and moving structural stages closer to the DFC to improve long-term forest condition, are intended goals of this project. According to the analysis and discussion presented in the EIS, these goals will not be met by any of the alternatives presented in the EIS. It is recommended that the EIS either include an alternative that meets all the stated need and objectives of the project, or limit the project's need and objectives to reducing expected fire intensity, capturing the economic value of the timber and reducing sediment impacts from roads.

Timber Harvest Impacts

We support the use of undisturbed buffer strips on fish bearing and non-fish bearing streams, intermittent flowing streams and wetlands. In addition, we support the use of best management practices (BMPs) to control erosion from timber sale areas, skid trails and access roads. However, timber harvest will include heavy equipment and the skidding of merchantable logs resulting in impacts that will not return to background levels for six years after disturbance. In addition, the proposed harvest and prescribed burn activities will not meet Regional Soil Quality guidelines for detrimental soil disturbance prior to the application of BMPs. Therefore, we recommend that timber harvest be limited to winter months when snow pack would minimize harvest impacts and that BMPs be implemented as soon as an area is harvested and conditions are suitable for their success.

Roads

Table 3.6-1 describes the roads that currently exist within the project area and provides maintenance level ratings for these roads. However, the EIS does not describe the type of maintenance associated with each of these levels. The EIS needs to define these levels, discuss the impacts (e.g., sediment yields) associated with each of these maintenance levels, and how the proposed project may change these levels.

The EIS states that the archery range, located within the project area, has limited parking and a poorly constructed access road that doesn't properly drain leaving it with deep standing puddles for most of the summer. In addition, improvements in the archery range area are needed to meet Forest Standards and Guidelines. However, the EIS does not identify the impacts the archery range has on the project area, nor are the impacts from the archery range included in the cumulative impacts analyses. The EIS needs to discuss the impacts the archery range has on project area including sediment yields and water quality impacts. In addition, the EIS should discuss what measures this project includes to address these impacts.

Big Game Cover

Section 3.4.4 of the EIS states that the current big game forage:cover ratio in the project area is 35:65 (4,207 acres forage, 7,793 acres cover). Section 4.6.4 of the EIS states that the cover:forage ratio under Alternative 1 (No Action) is 65:35 and while there is no forest plan guidelines for cover:forage ratio, 40:60 is considered optimum for big game. Table S-4 lists the cover:forage ratio for Alternative 1 as 65:35 and reiterates that the optimum would be 40:60. It is not clear what the current big game cover:forage ratio is, whether it is close to the optimum ratio for big game, and what the ratio would be for each of the alternatives. The discrepancies in cover:forage ratios need to be corrected in the EIS. In addition, the EIS needs to clarify if the alternatives will result in significant changes in the cover:forage ratio, and discuss the impacts these changes would have on big game.